

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
Honorable T.S. Ellis, III
Trial: Oct. 19, 2021

DEFENDANT'S PROPOSED VERDICT FORM

Mr. Zackary Ellis Sanders, through counsel, respectfully requests that the Court use the attached verdict form at trial in the above captioned matter.

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UNITED STATES OF AMERICA,

v.

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Defendant.

Case No. 1:20-cr-00143
Honorable T.S. Ellis, III
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VERDICT FORM

COUNT ONE

With respect to Count One, production of child pornography:

We, the jury, find that government exhibit 505B:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

AND

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT TWO

With respect to Count Two, production of child pornography:

We, the jury, find that government exhibit 511J

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

AND

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT THREE

With respect to Count Three, production of child pornography:

We, the jury, find that government exhibit 503E:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

OR

We, the jury, find that government exhibit 503J:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

OR

We, the jury, find that government exhibit 503P:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

AND

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT FOUR

With respect to Count Four, production of child pornography:

We, the jury, find that government exhibit 509G:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

AND

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT FIVE

With respect to Count Five, production of child pornography:

We, the jury, find that government exhibit 501R:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

OR

We, the jury, find that government exhibit 501V:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

AND

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT SIX

With respect to Count Six, receipt of child pornography:

We, the jury, find that government exhibit 507H:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

OR

We, the jury, find that government exhibit 507J:

Does not depict a minor engaging in sexually explicit conduct: _____

Depicts a minor engaging in sexually explicit conduct: _____

AND

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT SEVEN

With respect to Count Seven, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT EIGHT

With respect to Count Eight, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT NINE

With respect to Count Nine, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT TEN

With respect to Count Ten, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT ELEVEN

With respect to Count Eleven, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

COUNT TWELVE

With respect to Count Twelve, possession of child pornography:

We, the jury, find government exhibit _____ depicts a minor engaging in sexually explicit conduct.

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: _____

Guilty: _____

If your verdict is not guilty as to Count Twelve, please do not answer the following question.

If your verdict is guilty as to Count Twelve, please answer the following question:

Did a visual depiction involved in the offense charged in Count Twelve, government exhibit

_____ involve a prepubescent minor or a minor who had not attained 12 years of age?

No: _____

Yes: _____

So say we all this _____ day of _____, 2021.

Foreperson

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress